

EXHIBIT A

1082

COOPER & SCHALL, P.C.
BY: CHARLES S. COOPER, ESQUIRE
ATTY. I.D. NO. 46568
1760 MARKET STREET, SUITE 1100
PHILADELPHIA, PA 19103
PHONE: 215-561-3313

ATTORNEY FOR
PLAINTIFF (S)

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS	:	
716 North Barrett Lane	:	
Christiana, DE 19702	:	DISTRICT COURT
PLAINTIFF	:	
	:	NO. 04-251 JJF
VS.	:	
	:	
JO ELLEN CHAPEN SHELDON	:	
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	

RULE 26(a) INITIAL DISCLOSURES

1. **SUMMARY OF CONTESTED FACTS:** On or about April 23, 2002, Plaintiff, Ashley Adams, owned and operated an automobile which she was driving on Route 896 at the intersection with 1260 Old Baltimore Pike, City of Newark, State of Delaware when she was stopped at red traffic light and was so situated the Defendant, Jo Ellen Chapin Sheldon, negligently and carelessly struck the Plaintiff's vehicle in the rear, which was caused solely from the negligence, carelessness, and/or recklessness of the Defendants herein and was in no manner whatsoever due to any act or failure to act on the part of the Plaintiff.

2. **IDENTITIES OF INDIVIDUALS LIKELY TO HAVE KNOWLEDGE OF DISCOVERABLE FACTS:**

Fact Witnesses:

- a. Ashley Adams
716 N. Barrett Lane
Christiana, DE 19702

- b. Jo Ellen Chapen Sheldon
708 Pebble Beach Drive
Elkton, MD 21921
- c. Cpl. R. Lewis 894
Delaware State Police Troop 9
414 Main Street
Odessa, DE 19730
(302) 378-5218

Expert Witnesses:

- a. Dr. Conrad K. King, Jr., M.D.
Delaware Diagnostic & Rehabilitation Center, P.A.
1700 Wawaset Street
Suite 100
Wilmington, DE 19806
(302) 777-3955
- b. Dr. Matthew J. Eppley, M.D.
Delaware Neurosurgical Group, P.A.
4745 Ogletown-Stanton Road, Suite 117
Newark, DE 19713
(302) 366-7671
- c. Dr. Douglas R. Briggs, D.C.
1STATE Health & Wellness
202 Lantana Dr.
Lantana Square Shopping Center
Hockessin, DE 19707-8807
(302) 239-1600
- d. Dr. Bruce Grossinger, D.O.
Swarthmore Neurology Associates
4100 Dawnbrook Drive
Suite 4
Wilmington, DE 19804
- e. Dr. Michael L. Brooks, MD
Mercy Fitzgerald Hospital
Radiology Department
1500 Lansdowne Ave.
Darby, PA 19023

(610) 237-4355

f. Dr. Eric C. Marks, D.C.
1STATE Health & Wellness
202 Lantana Dr.
Lantana Square Shopping Center
Hockessin, DE 19707-8807
(302) 239-1600

g. Dr. Donald E. Jennings, Ed.D.
Stonewood Office Campus, Unit 109
826 Bustleton Pike
Feasterville, PA 19053
(215) 364-5782

3. **DOCUMENTS AND THINGS IN THE POSSESSION OF COUNSEL
OR THE PARTY:**

See Medical Records and Bills attached hereto as Exhibits "A" through
"T".

- a) Delaware Diagnostic & Rehabilitation Center, PA, 4/29/2002 - 5/31/2005.
- b) Eckerd Pharmacy receipts, 04/26/2002.
- c) Christiana Hospital, date of service 04/24/2002.
- d) Happy Harry's receipts, 04/29/2002 - 1/15/2003.
- e) Doctors for Emergency Service, 04/27/2002.
- f) Delaware Neurosurgical Group, PA, 04/25/2002 - 02/11/2003.
- g) Christiana Care, 04/23/2002 - 05/03/2002.
- h) Christiana Care Imaging Service, 04/25/2002 - 02/11/2003.
- i) Cecil County Commissioner/BLS, 04/24/2002 - 04/26/2002.
- j) Newark Chiropractic Health Center, P.A., 02/20/2002 - 8/19/2002.

- k) Lantana Chiropractic Health Center, P.A., 08/24/2002 - 12/07/2002.
- l) X-Ray Associates, PA, 04/27/2002.
- m) Christiana Care VNA HME, 05/08/2002.
- n) Swarthmore Associates, records from 6/28/02 - 12/06/02.
- o) First State Orthopedics, PA, 06/03/2002. This was previously provided to Plaintiff's attorney, Charles S. Cooper, by Defense counsel, on May 9, 2005.
- p) Christiana Care Health Services CT Scan, dated 04/23/2002.
- q) Delaware Diagnostic & Rehabilitation Center, P.A., records from 04/29/2002 - 08/23/2004.
- r) Christiana Care Health Services Discharge Instructions, dated 04/26/2002.
- s) Christiana Care Health Services Work/Activity Statement, 04/30/2002.
- t) Delaware Neurosurgical Group, Return to Work slip, dated 05/22/2002 and 07/02/2002.

Other documentation provided by the plaintiff:

- a) See a copy of Plaintiff's Auto Declaration Page of automobile insurance provided by State Farm Insurance covering the period of insurance immediately after the accident attached hereto as exhibit "u".
- b) A copy of Plaintiff's Notice of Payment Due from State Farm Insurance attached hereto as exhibit "v".
- c) A copy of the State of Delaware Uniform Traffic Collision Report from the date of the accident attached hereto as exhibit "w".
- d) A copy of a Memorandum from Plaintiff's employer, Delaware Park, dated 08/20/2002 attached hereto as exhibit "x."

- e) A copy of Plaintiff's payment from her insurance company for lost wages covering periods 08/15/2002 and 08/23/2002 attached hereto as exhibit "y".

4. **INSURANCE AGREEMENTS IN FORCE:**

Not Applicable.

5. **STATEMENT OF THE BASIS FOR ANY DAMAGES CLAIMED:**

- a. See medical bills attached hereto as Exhibits "o" through "u".

- b. **PAIN AND SUFFERING:**

Plaintiff to testify as to pain and suffering after accident.

- c. **LOST WAGES:**

Information to be provided.

COOPER & SCHALL, P.C.



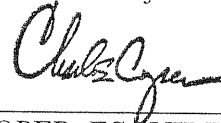
BY: _____

CHARLES S. COOPER, ESQUIRE
ATTORNEY FOR PLAINTIFF
ASHLEY ADAMS

Dated:

VERIFICATION

I, CHARLES S. COOPER, ESQUIRE, counsel for Plaintiff, verifies that the statements made in the foregoing document are true and correct to the best of my knowledge. I understand that false statements herein are made subject to the penalties of relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Charles S. Cooper", written in dark ink.

CHARLES S. COOPER, ESQUIRE
ATTORNEY FOR PLAINTIFF

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DISTRICT COURT

NO. 04-251 JJF

VS.

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

CERTIFICATE OF SERVICE

I, Charles S. Cooper, Esquire, counsel for the Plaintiff, Ashley Adams, hereby states that a true and correct copy of the Plaintiffs' Rule 26(a) Initial Disclosures was served on the counsel below on June 20, 2005, by placing a copy of same in the Federal Express overnight mail service, postage prepaid.

Beth H. Christman, Esquire
Casarino, Christman & Shalk, P.A.
Conectiv Bldg. - Suite 200
Wilmington, DE 19899

COOPER & SCHALL, P.C.



Date:

CHARLES S. COOPER, ESQUIRE
Attorney for Plaintiff, Ashley Adams